



OFFICE OF THE CITY MANAGER

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January 15, 2014

Ms. Hilary Papendick and Ms. Lesley Ewing  
California Coastal Commission  
c/o Sea-Level Rise Work Group  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

Dear Ms. Papendick and Ms. Ewing:

The City of Santa Cruz is a community committed to the proper management of coastal resources, now and in perpetuity. That said, we value the actions taken by California Coastal Commission (CCC) staff to develop guidance for the management of coastal resources in the face of increased rates of sea level rise (SLR).

The City of Santa Cruz has prepared and adopted both a Climate Action Plan and a Climate Adaptation Plan and therefore recognizes the level of effort that was required of CCC staff to complete this Draft Sea-Level Rise Policy Guidance (Draft SLR Guidance). We also recognize that such efforts to devise policies and actions are unprecedented and must be seen as incremental steps within a rapidly changing discipline. We therefore appreciate the opportunity to contribute to this guidance based on our current understanding of future threats and the socioeconomic implication that those threats place on coastal communities like Santa Cruz. We hope that the recommendations offered below will aid CCC staff in their continued efforts to lead sound coastal planning regarding SLR.

**Comments on the CCC Draft Sea-Level Rise Policy Guidance**

In general, the Draft SLR Guidance has many valuable recommendations, some of which can be employed quickly to aid coastal communities working to identify vulnerabilities and risks to SLR, as well as recommendations that will aid future planning to address local vulnerabilities and risks. In fact, Santa Cruz will benefit from two State-sponsored projects that have been initiated (State Coastal Conservancy sponsored by the Monterey Bay Sea Level Rise Assessment

Project and the Ocean Protection Council sponsored by the Monterey Bay Coast SLR Adaptation Project) to aid in the development and evaluation of various adaptation strategies.

The Draft SLR Guidance provides valuable examples of how communities can address SLR but fails to reflect the limitations local municipalities have to implement such measures and does not describe how the State will work with local agencies to improve local capacity to implement sound strategies. Other recommendations within the Draft SLR Guidance describe logical direction that can be taken by cities and counties in the future, but, as of yet, California lacks much of the site-specific data on risks of SLR and proven examples of the recommended adaptation policies necessary to make local adoption of these measures within Local Coastal Programs (LCPs) programmatically feasible.

Many of the more innovative policy and response strategies outlined within the Draft SLR Guidance are vague on how such policies could be implemented. Provisions of real-world examples would help illustrate and support these policy recommendations. Such real-world examples are necessary to aid adoption and implementation by local governments. Without examples describing how more complex and dynamic measures can be employed through the cooperative support of State agencies, regional foundations, and local municipalities, most communities will be unable to adequately employ many of these recommendations.

Some recommendations within the Draft SLR Guidance seem impractical for implementation through LCPs and Coastal Development Permits (CDPs), and a review of the legal parameters of their application is needed (for example, the rezoning of hazard areas or phasing out development and use in certain areas). Recommendations to review land use designations and make revisions based on new SLR projections is an enormous undertaking. We are uncertain how to effectively "update land use designation to limit development within areas subject to hazards" within urban settings like Santa Cruz. Zoning and site restrictions (setbacks of future development) within currently developed communities through CDPs on a case-by-case parcel-level basis will most likely compromise attempts to implement uniform approaches to adaptation along specific segments of the coast.

Finally, beaches, coastal access, coastal wetlands, agriculture, and urban development cannot all be protected equally everywhere, and LCPs should be used to define protection and adaptation priorities, response strategies, and the expected resource implications of selected responses, as well as a regional strategy to manage all coastal resources adequately within defined regions of the coast. While the Draft SLR Guidance defines many of the tools for use by cities, there are no instructions on how to implement a coastal adaptation strategy that does not try to accomplish all objectives equally everywhere.

Therefore coastal communities need planning guidelines to develop policies that prioritize certain needs over others for specific sections of the coast. Urban communities will most likely focus on protection of current development while rural areas can better focus policies towards retreat and adaptation. Agreements must be made between local municipalities and State regulatory agencies regarding adaptation and protection strategies appropriate for various

locations, and it must be acknowledged that regardless of the actions taken, some coastal resources and services will be lost.

It is our hope that this document could also demonstrate how the CCC and other State agencies will support local government efforts to prioritize SLR adaptation strategies and implement those strategies effectively through additional financial and programmatic support. There is little reference to how local governments can participate in regional planning processes, in State forums tasked with vetting such policy ideas, and in defining future roles of State and local partners in implementing adaptation strategies. There is also little acknowledgment of how the State will reduce regulatory hurdles to those communities that adopt LCP policies which define how they plan to adapt locally to a changing coastline.

In addition to providing more detail and examples, we also recommend that greater opportunities be made available for local municipalities to participate in the development of policies and adaptation strategies through the inclusion of local partners in efforts defined within the section termed "Next Steps." Specifically, Goal 3 for Next Steps should include participation by local communities as well as State agencies. We believe that policy recommendations that do not fully recognize the capacities coastal communities have and do not have to implement such policies could lead to local confusion, frustration, and inaction.


Key actions that we feel are necessary before local governments can take action to integrate adaptation strategies into LCPs include:

1. *The State will need to provide additional technical assistance and funding for local municipalities to: 1) evaluate risks and threats, 2) select priority resources for protection (at the detriment to others) within urban and rural sections of the coast, and 3) devise strategies of protection and adaptation measures that reflect local capacities and priorities.*
2. *The State will need to document how Draft SLR Guidance will be used as guidelines (as stated in the Executive Summary) and how future LCP updates and CDP applications will be reviewed based on the local prioritization of adaptation strategies.*
3. *The Draft SLR Guidance should include a description of the process that the CCC will take to support local prioritization of adaptation strategies within various sections of the coastline and support LCP modifications that prioritize employment of those strategies within those coastal segments.*
4. *The Draft SLR Guidance should include a description of the process that the CCC will take to help cities make difficult decisions regarding what resources are priorities to protect within different sections of the coast and define regional approaches to address unavoidable impacts to other coastal resources.*

5. *We recommend that the State work with local municipalities to define geographically specific climate adaptation strategies for inclusion in LCP updates and then establish mechanisms to reduce regulatory hurdles (including CEQA) for municipalities charged with implementing those strategies.*
6. *Since SLR adaptation policy and regulation is a relatively new discipline of land use planning, a legal analysis should be completed for the recommended policies and for the programmatic roles and land use changes required to implement these measures.*

Finally, we look forward to working more closely with the CCC and other State agencies as we take tangible steps towards creation of SLR adaptation strategies that can be referenced within LCPs. We feel, however, that State agencies and local municipalities do not currently have the necessary technical knowledge and real-world experience of addressing increased rates of SLR for Santa Cruz to quickly integrate such measures into our Local Coastal Program. We remain committed to participating in efforts to increase adaptation capacity of cities along the California Coast.

Sincerely,



Martín Bernal  
City Manager